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*Attorneys for Plaintiff**Johnson & Johnson Health Care Systems Inc.***UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY****JOHNSON & JOHNSON****HEALTH CARE SYSTEMS INC.,**

Plaintiff,

v.

**SAVE ON SP, LLC, EXPRESS
SCRIPTS, INC., AND ACCREDO
HEALTH GROUP, INC.,**

Defendants.

COUNSEL:

:

Civil Action No. 22-2632(JKS)(CLW)

:

Hon. Jamel K. Semper, U.S.D.J.

:

Hon. Cathy L. Waldor, U.S.M.J.

Hon. Freda L. Wolfson, Special Master

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NOTICE OF MOTION TO SEAL

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PLEASE TAKE NOTICE that on January 6, 2025 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff Johnson & Johnson Health Care Systems Inc. (“JJHCS”), together with counsel for

Defendant Save On SP, LLC (“SaveOnSP”), will apply before the Honorable Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order:

- (a) Permanently maintaining under seal the letters and supporting exhibits filed by the parties in connection with (i) SaveOnSP’s Motion to Compel JJHCS to Supplement its Response to SaveOnSP’s Interrogatory No. 12, dated October 28, 2024, with related briefing dated November 7 and November 14, 2024 (ECF Nos. 440, 443 & 452), filed November 8, November 11, and November 18, 2024 (the “Interrogatory No. 12/Best Price Motion”); and (ii) SaveOnSP’s Motion to Compel JJHCS to add nine additional custodians, dated October 9, 2024, with related briefing dated October 29, 2024 and November 11, 2024 (ECF Nos. 409, 427 & 451), filed October 14, October 30, and November 13, 2024 (the “Additional Custodians Motion”); and
- (b) Permitting JJHCS to file the proposed public versions of ECF Nos. 440, 443 & 452; and ECF Nos. 409, 427 & 451, attached as Exhibits A and B to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration and the indices in support of this motion. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to L. Civ. R. 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

Respectfully submitted,

Dated: December 10, 2024

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